

REMARKS

The specification is amended herein to replace the terms "~~maximums~~maxima", "minimums" and "prime" with "maxima", "minima" and "primary", respectively, as suggested by the Examiner. Claims 1-6 and 8-9 are amended herein. Claim 7 is canceled and new claims 10-28 are added. Support for the amendment is found, for example, in the original claims and in the specification on pages 13 and 17-20. No new matter is presented.

Accordingly, upon entry of the amendments, claims 1-6 and 8-28 will be all of the claims pending in the application.

I. Response to Claim Objections

Claims 1-9 are objected to because of informalities. The Examiner requests the Applicant to substitute the word *minima* for each and every occurrence of the presently recited *minimums*; to substitute the word *maxima* for each and every occurrence of the presently recited *maximums*; and to substitute the word *transmittance* for each and every occurrence of the presently recited *emission*. It is also requested that Applicant substitute the word *primary* for each and every occurrence of the presently recited *prime* - as the phrase *primary colors*, not *prime colors*, is the standard terminology in the art.

Applicants have amended the claims herein with respect to the terms "minimums", "maximums" and "prime" as suggested by the Examiner. However, with respect to the term "emission maximums", Applicants submit that the term "emission maxima" is more consonant with "reflectance minima" than "transmittance maxima", which is suggested by the Examiner. Specifically, the words "emission" and "transmittance" are basically different from each other and

represent different concepts. Thus, Applicants submit that the amendment to the claims herein obviate the objection.

Accordingly, Applicants respectfully request withdrawal of the objection to the claims.

II. Response to Claim Rejections Under 35 U.S.C. § 112, 1st Paragraph

Claims 1-9 are rejected under 35 U.S.C. 112, first paragraph, as allegedly being based on a disclosure that is not enabling. It is the Examiner's position that specific structural elements/features - e.g., the specific materials and elements, as well as the cooperative relation between the same, of which the respectively recited inventions [viz., anti-reflection film (claim 1), light-reflective display medium (claim 4), organic EL device, liquid crystal monitor (claim 9)] are comprised are critical or essential to the practice of the invention, but have not been included in the claim(s) and are not enabled by the disclosure.

More specifically, the Examiner asserts that as presently drafted, claims 1, 2, 4, 6, 7, and 9 are so-called *single means* claims. A single means, i.e., where a means recitation does not appear in conjunction with another recited element of means, is subject to undue breadth rejection under 35 U.S.C. 112, first paragraph. *In re Hyatt*, 708 F.2d 712, 714-715, 218 USPQ 195, 197 (Fed. Cir. 1983) (A single means claim that covered every conceivable means for achieving the stated purpose [in the instant case, e.g., the attainment of reflectance minima] was held nonenabling for the scope of the claim because the specification disclosed at most only those means known to the inventor). The Examiner asserts that when claims depend on a recited property, a fact situation comparable to *Hyatt* is possible, where the claim covers every conceivable structure (means) for achieving the stated property (result) while the specification discloses at most only those known to the inventor.

Applicants respectfully traverse the rejection and submit that the *Hyatt* case cited by the Examiner concerns “means-plus-function” claim language, and that a “single means” claim refers to a claim having only a single means-plus-function element instead of a combination of elements. However, the present claims do not involve means-plus-function claim language. Nevertheless, the claims are amended herein to further define the claimed invention and to facilitate and expedite examination.

Accordingly, Applicants respectfully request withdrawal of the rejection under 35 U.S.C. § 112, 1st paragraph.

III. Response to Claim Rejections under 35 U.S.C. § 102

Claim 1 is rejected under 35 U.S.C. §. 102(b) as allegedly being anticipated by Lynam (US 5,076,674).

According to the Examiner, Lynam discloses the invention as claimed - an anti-reflection film [see, e.g., Figs. 5 & 12; also see column 12, lines 25-67 - column 13, lines 1-2] having reflectance minimums [read: minima] in at least prime [read: primary] colors. See especially Fig. 12: the region between 490 nm and, say 550 nm encompassing a reflectance minimum in the blue [a primary color] region of the visible [i.e., 400 nm - 700 nm] portion of the electromagnetic spectrum, and the region between 550 nm and, say 650 nm encompassing a reflectance minimum in the red [a primary color] region of the visible [i.e., 400 nm and 700 nm] portion of the electromagnetic spectrum.

Applicants respectfully traverse the rejection and submit that Lynam does not disclose all elements of the present invention as recited in the amended claims. Specifically, independent claim 1 is amended herein to recite an anti-reflection film “having reflectance minima in at least three

wavelength regions containing respective three wavelength regions of three primary colors”, thereby further clarifying the claimed invention and distinguishing the claimed invention over the art.

As particularly evident from Figure 12, that Lynam merely discloses the wavelength region between 490 nm and 550 nm corresponding to the blue (a primary color) region of the visible (400 nm and 700 nm) portion of the electromagnetic spectrum, and the wavelength region between 550 nm and 650 nm corresponding to the red (a primary color) region as encompassing reflectance minima. That is, in Lynam, what encompasses the reflectance minima is two wavelength regions of blue and red of three primary colors and not three wavelength regions of three primary colors. Thus, Lynam does not teach all elements of the claims and can not be said to anticipate the presently claimed invention.

Accordingly, Applicants respectfully request withdrawal of the rejection under 35 U.S.C. §102.

IV. Response to Claim Rejections under 35 U.S.C. § 103

Claims 2-9 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Lynam (US 5,076,674) in view of Furugori et al (US 6,836,068). It is the Examiner’s position that it would have been obvious to one having ordinary skill in the art at the time the invention was made to have modified the various display devices disclosed by Furugori et al such that they utilize the anti-reflection film taught by Lynam, for at least the purpose of effectively managing the propagation of light (both ambient and dedicated) through and from display devices comprising the same.

Applicants respectfully traverse the rejection and submit that Lynam does not disclose, teach or suggest all elements of the presently claimed invention, i.e., an antireflection film having reflectance minima in three wavelength regions of three primary colors of the present invention, for

the reasons set forth above. Further, Lynam does not disclose, teach or suggest a light emitting display medium, a light reflective display medium, an organic EL device and a liquid crystal monitor using an organic EL device.

Furugori et al does not remedy the deficiencies of Lyman. Although Furugori et al discloses an antireflection layer 15 (in Figure 2 and related description thereof), a light absorption layer 32 having anti-reflection effects (see Figure 2 and its description), an organic EL device having organic layers containing a luminescence layer comprising luminescence materials of red (R), green (G) and blue (B) and an image display apparatus using the organic EL device, there is no disclosure with respect to the specific function of the anti-reflection layer 15 and the light absorption layer 32. Therefore, Furugori et al does not teach or suggest an anti-reflection film having reflectance minima in three wavelength regions of three primary colors as in the present invention. Consequently, one of ordinary skill in the art would not have been motivated to combine Lynam and Furugori as suggested by the Examiner with a reasonable expectation of success in achieving the claimed invention.

Even if the references were combined the presently claimed invention would not be obtained. Specifically, if the feature of an anti-reflection film having reflectance minima in two wavelength regions of blue and red of three primary colors disclosed by Lynam is applied to the feature of the anti-reflection layer 15 of Furugori et al as suggested by the Examiner, the display screen and anti-reflection film having reflectance minima in three wavelength regions of three primary colors of the display screen having such anti-reflection film of the present invention would not have been obtained.

Furthermore, Applicants submit that the Examiner's position that "in the event a display medium exhibits reflectance minimums in at least the prime colors, said display medium will

necessarily exhibit light emission maximums in the prime colors” is based on a misinterpretation of the term “the light emission” of the light emission source (the light emission layer) as the light transmittance from the display medium. In this regard, Applicants submit that the term “the light emission” refers to “the light emission of the light emission source (the light emission layer)”, which does not relate to the display medium exhibiting reflectance minima in the primary colors, in accordance with the present claims.

In addition, independent claim 4 is further distinguished over the references since the references does not teach or suggest the light-reflective display medium recited in the claim.

Accordingly, Applicants respectfully request withdrawal of the rejection under 35 U.S.C. § 103 over Lynam and Furugori et al.

V. New Claims

New claims 10-25 depend from amended independent claims 1, 2, 4 or 6 which each recite the element of “having reflectance minima in at least three wavelength regions containing respective three wavelength regions of three primary colors” and are distinguishable over the art of record for at least the same reasons. New independent claim 26 also recites this feature and claims 27-28 are dependent thereon. Therefore claims 26-28 are distinguishable over the art of record for at least the same reasons.

VI. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

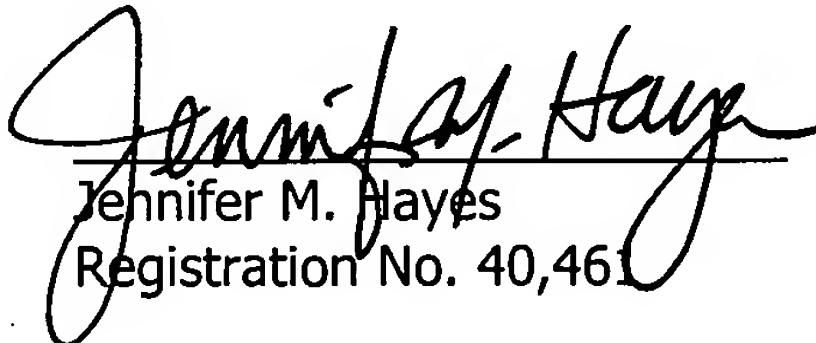
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Date: July 11, 2005